

B066

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

DAVID BATES
TAMARA KREITZER

Criminal No.

21-274

(18 U.S.C. §§ 2251(a), (e) and 2; and
2252(a)(2) and 2)

INDICTMENT

COUNT ONE

The grand jury charges:

In or between July 2020, and October 2020, in the Western District of Pennsylvania, the defendants, DAVID BATES and TAMARA KREITZER, aided and abetted each other and attempted to and did employ, use, persuade, induce, entice, and coerce Minor A, a female child' victim, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct: to wit, image files depicting Minor A engaged in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, and which depictions were produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a), (e) and 2.

FILED

JUN 23 2021

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WEST. DIST. OF PENNSYLVANIA

COUNT TWO

The grand jury further charges:

In or between July 2020, and October 2020, in the Western District of Pennsylvania, the defendant, DAVID BATES, aided and abetted by defendant, TAMARA KREITZER, did knowingly receive a visual depiction of a minor using any means and facility of interstate and foreign commerce, namely, a cellular telephone, the production of which involved the use of a minor engaging in sexually explicit conduct, and that depicted a minor engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256.

In violation of Title 18, United States Code, Section 2252(a)(2) and 2.

COUNT THREE

The grand jury further charges:

In or between July 2020, and October 2020, in the Western District of Pennsylvania, the defendant, TAMARA KREITZER, aided and abetted by defendant, DAVID BATES, did knowingly distribute a visual depiction of a minor using any means and facility of interstate and foreign commerce, namely, a cellular telephone, the production of which involved the use of a minor engaging in sexually explicit conduct, and that depicted a minor engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256.

In violation of Title 18, United States Code, Section 2252(a)(2) and 2.

FORFEITURE ALLEGATIONS

1. The allegations contained in Counts One, Two and Three of this Indictment are incorporated herein by reference as though fully set forth herein for the purpose of alleging criminal forfeiture pursuant to Title 18, United States Code, Section 2253(a)(3).

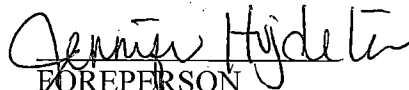
2. The United States hereby gives notice to the defendants charged in Counts One, Two and Three that, upon their conviction of such offenses, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2253, of any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses of conviction or any property traceable to such property, including, but not limited to the following:

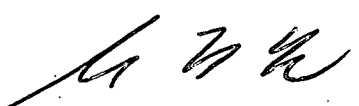
Galaxy A01 cell phone, SM-A015S

LG Stylo 4 cell phone, LM-Q710(FGN)

WHEREFORE, the government seeks forfeiture of the subject property pursuant to Title 18, United States Code, Section 2253(a)(3).

A True Bill,


FOREPERSON


STEPHEN R. KAUFMAN
Acting United States Attorney
PA ID No. 42108